

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 847**

**CERTIFICATION OF COUNSEL REGARDING MOTION OF THE U.S. SECURITIES  
AND EXCHANGE COMMISSION FOR ORDER FURTHER EXTENDING TIME TO  
TAKE ACTION, TO THE EXTENT NECESSARY, TO DETERMINE THE  
DISCHARGEABILITY OF A DEBT TO A GOVERNMENTAL UNIT  
PURSUANT TO 11 U.S.C. § 1141(d)(6)**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”), with authority on behalf of the U.S. Securities and Exchange Commission (the “**Commission**”), hereby certifies as follows:

1. On December 20, 2023, the Commission filed the *Motion of the U.S. Securities and Exchange Commission for Order Further Extending Time to Take Action, to the Extent Necessary, to Determine the Dischargeability of a Debt to a Governmental Unit Pursuant to 11 U.S.C. § 1141(d)(6)* [Docket No. 676] (the “**Motion**”). Attached to the Motion was, among other things, a proposed form of order approving the relief requested in the Motion (the “**Proposed Order**”).

2. Pursuant to the notice filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served so as to be received no later **January 3, 2024 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”). The Objection Deadline was extended for the Debtors, the Official Committee of Unsecured Creditors (the “**UCC**”), and the Official Committee of Equity Security Holders (the “**EC**,”) until January 10, 2024 at 4:00 p.m. (ET).

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

3. The Commission received no responses to the Motion and has reviewed the Court's docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. In addition, neither the Debtors, the UCC nor the EC oppose the entry of the Proposed Order.

WHEREFORE, the Commission therefore respectfully requests that the proposed form of order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.

*[Remainder of Page Intentionally Left Blank]*

Dated: February 2, 2024  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)  Doah Kim (admitted <i>pro hac vice</i>)  RJ Szuba (admitted <i>pro hac vice</i>)  555 South Flower Street, Suite 2700  Los Angeles, CA 90071  Telephone: (213) 620-7700  rkampfner@whitecase.com  doah.kim@whitecase.com  rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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